UNITED STATES DISTRICT COURT **DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND

IRBESARTAN PRODUCTS LIABILITY

LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO: Duffy, et al. v. Solco Healthcare U.S.,

L.L.C., *et al.*,

Case No. 1:18-cv-15076-RBK-JS

NOTICE OF VIDEOTAPED DEPOSITION OF PLAINTIFF JOHN DUFFY

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendants Prinston Pharmaceutical, Inc. and Solco Healthcare U.S. LLC, will take the deposition upon oral examination of John Duffy on February 9, 2021 at 9:00 a.m EST at 103 Gedney Street, Apartment 5E, Nyack, New York, 10960. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

> Rebecca E. Bazan Duane Morris LLP

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Date: January 8, 2021 Respectfully submitted,

s/ Rebecca E. Bazan

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Attorney for Defendants Prinston Pharmaceutical Inc., Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Huahai U.S., Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of January, 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff John Duffy was served upon the following by e-mail, with copies to all defense counsel of record by e-mail:

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s/ Rebecca E. Bazan Rebecca E. Bazan